

Submitted on Behalf of the National Amateur Radio Alliance (NARA)

Re: FCC Public Notice DA 25-219 – GN Docket No. 25-133

Subject: Comment on Identifying and Eliminating Obsolete or Burdensome Regulations

FCC Commission,

On behalf of the **National Amateur Radio Alliance (NARA)** and our growing membership—comprising licensed amateur radio operators, clubs, and organizations nationwide—we appreciate the opportunity to submit comments in response to FCC Public Notice DA 25-219. While we understand that much of the Commission’s focus will likely center on commercial uses of the radio spectrum, we urge the FCC to ensure that noncommercial services—especially the Amateur Radio Service—are not overlooked or weakened in the process.

Although some commenters have raised potential areas for review within amateur radio, we believe that the current regulatory framework, including licensing and spectrum protections, is essential to preserving amateur radio as a vital national resource. Strong, consistent regulation enables the Amateur Radio Service to continue delivering significant public benefits, and we encourage the Commission to approach any changes with thoughtful consideration.

Amateur Radio’s Role in Emergency Communications and Public Safety

Amateur radio continues to play a critical and unique role in our nation’s emergency communications infrastructure. Governed under 47 CFR Part 97, the Amateur Radio Service offers a decentralized, resilient, and independent system that has proven its value during countless natural disasters and infrastructure failures. When conventional networks are compromised, amateur radio operators step in to provide critical communications support to emergency management agencies, relief organizations, and impacted communities.

The continued effectiveness of this system depends on maintaining robust licensing requirements and the preservation of a dedicated amateur spectrum. Weakening these standards could impair the ability of amateur radio operators to deliver dependable communication in times of crisis. Licensed amateur operators understand radio theory, proper operating procedures, and how to avoid interference—skills essential for emergency coordination that cannot be ensured without appropriate regulatory oversight. These capabilities only exist because of a strong regulatory framework that promotes technical proficiency, coordination, and spectrum protection.

Preserving Licensing Standards and Spectrum Access

The current licensing system is not a barrier to entry—it is a quality assurance mechanism that promotes technical competence, responsible use, and a spirit of cooperation. Removing or reducing these standards would lead to interference, degraded communication quality, and the potential erosion of the amateur service’s credibility and effectiveness. Unlike other unlicensed or deregulated services, amateur radio supports a broad spectrum of educational, experimental, and emergency functions that depend on well-regulated access and coordination.

NARA members engage in a wide variety of amateur radio activities—from youth STEM education and contesting to public outreach, digital innovation, and experimentation with cutting-edge technologies. None of this is possible without reliable access to protected spectrum. Reducing our access to amateur bands would severely limit our ability to serve the public, promote education, and drive innovation.

Many of our members work closely with schools, emergency agencies, and community groups, using amateur radio to teach science, foster interest in engineering, and build the next generation of problem-solvers.

We therefore strongly urge the Commission to maintain and protect the spectrum allocated to the Amateur Radio Service. These bands are more than communication channels—they are platforms for learning, service, innovation, and international goodwill.

A Proven Asset for Innovation and National Resilience

Amateur radio continues to serve as an invaluable incubator for skills in RF engineering, electronics, software-defined radio, digital communication, and emergency preparedness. It inspires youth and equips individuals with the knowledge and experience that support careers in telecommunications, defense, aerospace, and public safety. Amateur radio is far more than a hobby—it is a national asset with real-world value. Our members are educators, first responders, veterans, students, scientists, mentors, and neighbors. What unites us is our enthusiasm for amateur radio and the belief that it continues to serve as an essential national resource.

Closing Remarks

In closing, we respectfully urge the Commission to preserve the existing regulations that govern the Amateur Radio Service, including current licensing structures and spectrum protections. These policies are not outdated or burdensome—they are essential to maintaining the effectiveness, credibility, and public benefit of amateur radio in the United States.

The **National Amateur Radio Alliance** is also preparing to launch a comprehensive *State of Amateur Radio* survey—an in-depth study aimed at evaluating the current needs, challenges, and opportunities within the amateur radio community. This initiative will examine key areas such as licensing, public service, technical education, innovation, and emergency communications. We expect this survey will reveal areas that need to be strengthened or improved, and we will gladly share the results with the Commission.

While we do not expect the FCC to focus on deregulating the Amateur Radio Service, we feel it is essential—on behalf of our diverse and dedicated membership—to join the many voices calling for continued protection of this invaluable and time-tested public service.

Thank you for your time, attention, and continued commitment to serving the public interest.

Sincerely,

Mikel Turner, W4OPS

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